

NELSON MULLINS RILEY &
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Counsel for Dätwyler Rubber & Plastics,
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Columbia, SC 29201
(803) 799-2000
GEORGE B. CAUTHEN (GBC-5268)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:)	CASE NO. 05-44481 (RDD)
)	
Delphi Corporation, <i>et al.</i> ,)	CHAPTER 11
)	(Jointly Administered)
Debtors.)	
)	

OBJECTION OF DÄTWYLER RUBBER TO NOTICE
OF AMENDED CURE AMOUNT

Däetwyler Rubber ("Däetwyler") hereby files its objection to the Debtor's Notice of Amended Cure Amount, and states as follows:

Pursuant to the Notice of Amended Cure Amount, the Debtors seek to reduce the cure amount of Daetwyler regarding contract number D0550072164 to \$0.00 (see Schedule 1 attached hereto for reference).

As reflected in the attached accounting, the cure amount for contract D055072164 is \$66,816. Daetwyler's representative has spoken with a Delphi representative which confirms that Delphi's records also show the cure amount as \$66,816. Therefore, it is believed that the \$0.00 cure amount reflected was in error.

Daetwyler and the Debtors appear that they will agree on the amount of the cure claim but this objection is to protect Daetwyler's interest until such resolution can be reached.

WHEREFORE, Daetwyler requests the Court to deny the Notice of the Amended Cure Amount for contract D0550072164 and set Daetwyler's cure amount for contract D0550072164 at \$66,816, and grant such other and further relief as is just and appropriate.

NELSON MULLINS RILEY & SCARBOROUGH, L.L.P.

By: /s/ George B. Cauthen

George B. Cauthen (admitted *pro hac vice*)
Jody A. Bedenbaugh (admitted *pro hac vice*)
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Attorneys for Däetwyler Rubber

July 17, 2009
Columbia, South Carolina

Dätwyler

Dätwyler Inc.
Rubber+Plastics
CH-6467 Schattdorf

Open item list as at 16.02.2006 for Delphi, Rochester

Document	Date	Due	Amount	Curr.	PO no.	Comments
91013806	9/13/2005	76	6,681.60	USD	550072164	new production
91013857	9/15/2005	76	6,681.60	USD	550072164	new production
91013942	9/19/2005	76	6,681.60	USD	550072164	new production
91014001	9/20/2005	76	6,681.60	USD	550072164	new production
91014189	9/22/2005	76	6,681.60	USD	550072164	new production
91014241	9/23/2005	76	6,681.60	USD	550072164	new production
91014261	9/26/2005	76	13,363.20	USD	550072164	new production
91014387	9/28/2005	76	13,363.20	USD	550072164	new production

Schedule 1

<u>Non-Debtor Counterparty</u>	<u>Contract(s)</u>	<u>Cure Amount</u>
DAETWYLER RUBBER	D0550072164	\$0.00

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I, the undersigned Administrative Assistant, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Dätwyler Rubber & Plastics, Inc., do hereby certify that I have served the below listed individuals in this action with a copy of the pleadings hereinbelow by Federal Express delivery, to the following addresses:

**PLEADINGS: OBJECTION OF DÄTWYLER RUBBER & PLASTICS, INC. TO
NOTICE OF AMENDED CURE AMOUNT**

PARTIES SERVED: VIA FEDERAL EXPRESS

Honorable Robert D. Drain
US Bankruptcy Court for the Southern
District of New York
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New York, NY 10004

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/s/ Patty Alexander 
Patty Alexander, Administrative Assistant

Columbia, South Carolina
July 17, 2009